IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI **JACKSON DIVISION**

TERRY ROBINSON, Individually and on Behalf of the Wrongful Death Beneficiaries of Dennis Earl Homes, Deceased

PLAINTIFF

CASE NO.: 310-CV-629-CWR-LRA

THE TOWN OF WALNUT GROVE; WALNUT GROVE CORRECTIONAL AUTHORITY; CORNELL COMPANIES, Inc.; GEO GROUP: WALTER (Brick) TRIPP; HEALTH ASSURANCE,

LLC: JOHN DOE, 1-5; and

JOHN DOE CORPORATIONS, 1-5

DEFENDANTS

MOTION TO WITHDRAW AS COUNSEL

COME NOW Earle S. Banks and the Law Offices of Dockins Turnage & Banks, PLLC, representing the Plaintiff, Terry Robinson, and move this Court for an Order granting him and the Law Offices of Dockins Turnage & Banks, PLLC, for permission to withdraw as counsel for Plaintiff Terry Robinson, and respectfully request that the Court allow Plaintiff an additional sixty (60) days to find new counsel. Heretofore, the law firm has been unable to obtain liability experts to prosecute the claims of the case.

WHEREFORE, PREMISES CONSIDERED, Earle S. Banks and the Law Offices of Dockins Turnage & Banks, PLLC, respectfully request this Court to grant them permission to withdraw as counsel for Plaintiff Terry Robinson, and to grant her an additional sixty (60) days to find new counsel to represent her. This the 1st day of March, 2012.

Respectfully submitted,

BY: s:/Earle S. Banks, Esq.
Earle S. Banks, Esq. MSB# 1732
Attorney for Plaintiff

OF COUNSEL:

Dockins Turnage & Banks, PLLC

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CERTIFICATE OF SERVICE

I, Earle S. Banks., hereby certify that a true and correct copy of the foregoing Motion has been served electronically via the ECF system to the following:

Lee Thaggard, Esq. HAMMACK, BARRY, THAGGARD & MAY, LLP Post Office Box 2009 Meridian, MS 39302

Counsel for Defendant, Walnut Grove Correctional Authority, Cornell Companies, Inc., GEO Group, and Walter "Brick" Tripp

Jeffrey T. Webb, Esq. Webb Law Firm, PLLC Post Office Box 452 203 South Pearl Street Carthage, MS 39051

Counsel for Defendant, Town of Walnut Grove

Robert H. Pedersen, Esq. Watkins & Eager, PLLC The Emporium Building 400 East Capitol St., Suite 300 Post Office Box 650 Jackson, MS 39205

Counsel For Defendant, Health Assurance, LLC

This the 1st day of March, 2012.

BY: s:/Earle S. Banks, Esq. Earle S. Banks, MSB # 1732